J. Robert Hamrick Director



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FEDERAL LUMBRICATION COMMISSION Georgia 30037-0808
OFFICE OF THE SECRETARY

GEORGIA BUREAU OF INVESTIGATION NED

March 12, 1993

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Ms. Donna Searcy Secretary Federal Communications Commission 1919 M Street N.W. Room 222 Washington, D. C. 20554

Re: PR document number 92-235

Dear Ms. Searcy:

The Georgia Department of Administrative Services has informed me that your agency intends to impose new restrictions on the use of high band radio frequencies in the near future. I feel compelled to respond to the proposed rule making, issued by the Federal Communications Commission, which has a dramatic impact on the Georgia Bureau of Investigation as well as other state and local law enforcement agencies within the State of Georgia.

We in State Government, as all other government entities, are dependent on available public funds to finance equipment purchases. Our agency and many others in the State of Georgia do not have adequate funding to replace all radio communications equipment at one time, and there are no migration paths identified in your proposal. We believe that we would be required to expend between three million and five million dollars to comply with this proposal.

One of the required functions of my agency is to respond and assist local government agencies, as well as to provide support to federal government agencies within the State of Georgia. Under your proposal there is no interoperatability between old and new radio systems, nor do the proposals for local and state government offer compatibility with federal government agencies band. Ιn these times of consciousness, it is unlikely that sufficient funds would be available to furnish an adequate number of mobile radios of different types for each of my employees. We also depend heavily on voice encryption for communication security while conducting sensitive and/or potentially dangerous investigations. appears that your proposal results in communication equipment not consistent with voice encryption.

PR document number 92-235 Page 2

In conclusion, we support the proposals of APCO Project 25 which recommends channel spacing consistent with NTIA Standards for federal government use. While we in public safety recognize a need for greater frequency spectrum, we strongly encourage a more measured and conservative approach to this change. We also suggest that in an area where the safety of individual officers may be affected, change can only be accomplished after careful examination of the ramifications.

Thank you for your attention in this matter.

Sincerely,

J. Robert Hamrick

Director

JRH:mp